

Ramon Rossi Lopez (admitted *pro hac vice*)
(CA Bar No. 86361)
LOPEZ McHUGH LLP
100 Bayview Circle, Suite 5600
Newport Beach, California 92660
rlopez@lopezmchugh.com

Mark S. O'Connor (011029)
GALLAGHER & KENNEDY, P.A.
2575 East Camelback Road
Phoenix, Arizona 85016-9225
Telephone: (602) 530-8000
mark.oconnor@gknet.com

Attorneys for Plaintiffs

Richard B. North, Jr. (admitted *pro hac vice*)
Georgia Bar No. 545599
Matthew B. Lerner (admitted *pro hac vice*)
Georgia Bar No. 446986
NELSON MULLINS RILEY &
SCARBOROUGH LLP
201 17th Street, NW / Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
Telephone: (602) 382-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com

*Attorneys for Defendants C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

In Re Bard IVC Filters Products Liability
Litigation

No. MD-15-02641-PHX-DGC

DORIS SINGLETON JONES, an
individual,

Plaintiff,

v.

C.R. BARD, INC., a New Jersey
corporation and BARD PERIPHERAL
VASCULAR, an Arizona corporation,

Defendants.

**JOINT NOTICE OF FILING
AMENDED PROPOSED JURY
INSTRUCTIONS**

(The Honorable David G. Campbell)

1 In accordance with the Court's direction on Friday, May 4, 2018, the Parties hereby
2 submit their Amended Proposed Jury Instructions and shows the Court as follows:

3 The parties used the final instructions given in *Booker* with the following changes:

- 4 1. The parties changed "Booker" to "Jones" and "G2" to Eclipse." Those changes
5 are not indicated by "track changes" or color.
- 6 2. Changes proposed by the Plaintiff are highlighted in yellow.
- 7 3. Changes proposed by Bard are highlighted in blue.
- 8 4. Changes proposed collectively by both Plaintiff and Bard are highlighted in
9 green.
- 10 5. Proposed deletions are marked through using "track changes," but are not
11 deleted. If the deletion is proposed by Plaintiff it is highlighted in yellow, if it
12 proposed by Bard it is highlighted in blue, and if it is proposed by both parties it
13 is highlighted in green.
- 14 6. Proposed additions are highlighted as indicated in 2-4 above.

15 Other than names the parties made no changes to the following Instructions:

16 1 – 13, 15, 21, and 23 – 28

17 For each party's proposed instructions that were not given in *Booker*, the title is highlighted
18 with the respective color listed above. The parties inserted those new instructions in where
19 they believe they should be included.

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1 RESPECTFULLY SUBMITTED this 7th day of May, 2018.

2
3 By: /s/ Mark S. O'Connor

4 Mark S. O'Connor (011029)
5 Gallagher & Kenneth, P.A.
2575 East Camelback Road
Phoenix, AZ 85016-9225

6 Ramon Rossi Lopez
7 (admitted *pro hac vice*)
8 CA Bar No. 86361
LOPEZ McHUGH LLP
100 Bayview Circle, Suite 5600
Newport Beach, CA 92660

9 *Attorneys for Plaintiffs*

By: /s/ Richard B. North, Jr.

Richard B. North, Jr. (*pro hac vice*)
Georgia Bar No. 545599
Elizabeth C. Helm (*pro hac vice*)
Georgia Bar No. 289930
NELSON MULLINS RILEY &
SCARBOROUGH LLP
201 17th Street, NW / Suite 1700
Atlanta, GA 30363

James R. Condo (005867)
Amanda C. Sheridan (027360)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren, Suite 1900
Phoenix, AZ 85004-2202

*Attorneys for C. R. Bard, Inc. and Bard
Peripheral Vascular, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of May, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Richard B. North, Jr.

Richard B. North, Jr.